

JS 44 (Rev. 10/20)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

The Honorable Paula A. Patrick

(b) County of Residence of First Listed Plaintiff Philadelphia

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

James E. Beasley, Jr., Esquire, The Beasley Firm, LLC,  
1125 Walnut Street, Phila., PA 19107 215-592-1000**DEFENDANTS**The Daily Beast Company, LLC d/b/a The Daily Beast and  
Laura BradlevCounty of Residence of First Listed Defendant New York

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                                   |   | PTF                        | DEF                                   |
|---|---------------------------------------|---------------------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1            | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4            |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input checked="" type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3            | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6            |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input checked="" type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
28 USC Section 1332

Brief description of cause:

Defamation False Light; Damage to Reputation

**VII. REQUESTED IN COMPLAINT:**☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.**DEMAND \$**

in excess of jurisdiction

CHECK YES only if demanded in complaint:

**JURY DEMAND:**☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

4-20-2022

/s/ James E. Beasley, Jr.

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**DESIGNATION FORM**

*(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)*

Address of Plaintiff: 1125 Walnut Street, Philadelphia, PA 19107  
 Address of Defendant: 555 W. 18th Street, Second Floor, New York, NY 10011  
 Place of Accident, Incident or Transaction: Philadelphia, PA

**RELATED CASE, IF ANY:**

Case Number: \_\_\_\_\_ Judge: \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when **Yes** is answered to any of the following questions:

- |  |                              |                             |
|--|------------------------------|-----------------------------|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?            | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☒ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 04/20/2022

*James E. Beasley, Jr.*  
 Attorney-at-Law / Pro Se Plaintiff

**83282**

Attorney I.D. # (if applicable)

**CIVIL: (Place a ✓ in one category only)**

**A. Federal Question Cases:**

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Patent
- ☐ 6. Labor-Management Relations
- ☐ 7. Civil Rights
- ☐ 8. Habeas Corpus
- ☐ 9. Securities Act(s) Cases
- ☐ 10. Social Security Review Cases
- ☐ 11. All other Federal Question Cases

(Please specify): \_\_\_\_\_

**B. Diversity Jurisdiction Cases:**

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☒ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury (Please specify): \_\_\_\_\_
- ☐ 7. Products Liability
- ☐ 8. Products Liability – Asbestos
- ☐ 9. All other Diversity Cases

(Please specify): \_\_\_\_\_

**ARBITRATION CERTIFICATION**

*(The effect of this certification is to remove the case from eligibility for arbitration.)*

I, James E. Beasley, Jr., counsel of record or pro se plaintiff, do hereby certify:

☒ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☐ Relief other than monetary damages is sought.

DATE: 04/20/2022

*James E. Beasley, Jr.*  
 Attorney-at-Law / Pro Se Plaintiff

**83282**

Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.



**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

Honorable Paula A. Patrick	:	CIVIL ACTION
	:	
	:	
v.	:	
The Daily Beast Company, LLC d/b/a	:	
The Daily Beast and Laura Bradley	:	NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( X )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ( )

4-20-2022	James E. Beasley, Jr.	Plaintiff, Honorable Paula A. Patrick
<b>Date</b>	<b>Attorney-at-law</b>	<b>Attorney for</b>
215-592-1000	215-593-1523	jim.beasley@beasleyfirm.com
<b>Telephone</b>	<b>FAX Number</b>	<b>E-Mail Address</b>

(Civ. 660) 10/02



**HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.**

**Philadelphia Bar Association  
LAWYER REFERRAL & INFO.  
One Reading Center  
Phila., PA 19107  
(215) 238-1701**

**OFICINA PUEDE PROVEER DE USTED INFORMACION SOBRE EMPLEAR A UN ABOGADO. SI USTED NO TIENE SUFICIENTE DINERO PARA EMPLEAR UN ABOGADO, ESTA OFICINA PUEDE PODER PROVEER DE USTED LA INFORMACION SOBRE LAS AGENCIAS QUE PUEDEN OFRECER SERVICIOS LEGAL A LAS PERSONAS ELEGIBLES EN UN HONORARIO REDUCIDO O NINGUN HONORARIO.**

**Asociacion de Licenciados de Filadelpia  
Servicio de Referencia e Informacion  
One Reading Center  
Phila., PA 19107  
(215) 238-1701**



Commonwealth of Pennsylvania, namely false claims about a Pennsylvania jurist, issues of Pennsylvania law, as well as a highly publicized lawsuit brought in the First Judicial District of Pennsylvania.

3. As described by The New York Times<sup>2</sup>, “Q’Anon” is:

QAnon is the umbrella term for a set of internet conspiracy theories that allege, falsely, that the world is run by a cabal of Satan-worshipping pedophiles.

QAnon followers believe that this cabal includes top Democrats like President Joseph R. Biden Jr., Hillary Clinton, Barack Obama and George Soros, as well as a number of entertainers and Hollywood celebrities like Oprah Winfrey, Tom Hanks and Ellen DeGeneres and religious figures including Pope Francis and the Dalai Lama. Many of them also believe that, in addition to molesting children, members of this group kill and eat their victims to extract a life-extending chemical called adrenochrome.

According to QAnon lore, former President Donald J. Trump was recruited by top military generals to run for president in 2016 to break up this criminal conspiracy and bring its members to justice. Many of these cabal members will soon be arrested, the theory goes, and some will be imprisoned at Guantánamo Bay, while others will face military tribunals and be executed.

4. On 9 October 2021 article titled *“Q’Anon Linked Judge Rules in Unhinged War Over Philly’s Columbus Statute; After a lawyer threatened to tear down a plywood box covering the statue himself, Judge Paula Patrick ruled that it must remain visible to the public.”* Article attached as Exhibit “A.”

5. The Daily Beast defendants specifically penned this malicious article for distribution and publication in Philadelphia County, Pennsylvania so as to maximize the impact on Judge Patrick and stain her reputation as a jurist in Philadelphia County.

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Eighth Judicial District Court, 592 U.S. \_\_\_\_ (2021). Given the text, tenor and subject basis for this article, there is plainly a strong “relationship among the defendant, the forum, and the litigation.”

<sup>2</sup> *“What Is QAnon, the Viral Pro-Trump Conspiracy Theory?”* New York Times, K. Roose, 3 September 2021.

6. The Daily Beast's knowingly false and intentionally misleading headline is defamatory and was done to harm Judge Patrick, whose politics apparently do not align with those of the Daily Beast defendants.

7. The Daily Beast defendants used this knowingly false "Q'Anon link" to punish a female, conservative African-American jurist for following the law and procedures related to the management of artwork in Philadelphia as opposed to furthering its own agenda.

8. The Daily Beast's article was done to compromise Judge Patrick's standing as a highly regarded, honest and reputable jurist in its own politically and woke motivated attempt to further its own goals to cancel relevant history by placing Judge Patrick in a false light with regards to her conduct as a jurist and her decision making related to a controversial issue of public import.

9. The Daily Beast's malicious objectives have, regrettably, been met and Judge Patrick has suffered significant and permanent damages for the false light into which these articles have placed her.

10. In spite of widely available information and reporting that Judge Patrick was not affiliated with or otherwise "linked" to Q'Anon, the Daily Beast defendants failed to properly investigate the outrageous claims attempting to link a well-respected jurist to a crackpot and unhinged conspiracy group known as Q'Anon; this failure has resulted in a permanent stain on her otherwise well regarded and respected reputation and anyone who searches Judge Patrick will be confronted with the false light presentation that Her Honor is somehow linked to, and therefore guided by, these Q'Anon lunatics.

11. Aside from a clear disregard for due diligence, the Daily Beast defendants' publications is a malicious attack upon the character of a dedicated public servant. It is



an unfortunate, but all too accurate, statement to say that these defendants value reckless, provocative articles in spite of knowing the truth.

12. The false light into which Judge Patrick has been placed by these defendants has also caused significant professional, personal, and emotional damages and harm to her.

13. To the average reader, Judge Patrick is now forever linked to Q'Anon, as intended by these defendants. This lawsuit now follows.

## **II. JURISDICTION AND VENUE**

14. This Court has subject matter jurisdiction in this case pursuant to 28 U.S.C. § 1332. The Defendants are citizens of states other than which the Plaintiff is a citizen. The amount in controversy substantially exceeds the requirement for Federal Diversity Jurisdiction and to guarantee a jury trial, exclusive of interest and costs.

15. This Court has jurisdiction over the parties because the Defendants targeted their specific statements, publications, and tortious conduct at issue in this action directly toward and in Philadelphia County, Pennsylvania and the Commonwealth of Pennsylvania.

16. Venue is proper pursuant to 28 U.S.C. § 1391 because all Defendants are subject to the Court's personal jurisdiction with respect to the civil action in question. The Defendants published their defamatory statements in Philadelphia County, Pennsylvania where they targeted their unlawful scheme.

## **III. PARTIES**

17. Plaintiff, The Honorable Paula A. Patrick, is an individual, jurist, and attorney in good standing, admitted in 1994 and elected to the bench having practiced law

before being elected to the bench in 2003; she is also a citizen of the Commonwealth of Pennsylvania.

18. Defendant, The Daily Beast Company, LLC d/b/a/ The Daily Beast (“The Daily Beast, is a media entity that publishes The *Daily Beast*.

19. Defendant, Laura Bradley was, at all relevant times, an employee or agent of The *Daily Beast*, and maliciously created and published the 9 October 2021 article at issue in this lawsuit.

20. The “Daily Beast defendants” are The Daily Beast and Bradley.

#### **IV. FACTS**

21. The Daily Beast used the false light into which Judge Patrick was placed by the *Inquirer’s* flawed reporting to further its own agenda and malign Judge Patrick, when creating and publishing the 9 October 2021 article.

22. The Daily Beast defendants’ reckless and malicious reporting on the Christopher Columbus statute ruling maligns Judge Patrick by affirmatively asserting a link between Judge Patrick and Q’Anon in the headline, and further maligns her by adding the irrelevant and knowingly false “Q’Anon link” in the body of the story to put Judge Patrick’s competency and objectivity as a jurist into question.

23. Prior to publishing this 9 October 2021 article, with its aforementioned defamatory statements, inferences and innuendoes, The Daily Beast made no attempt to confirm this alleged Q’Anon “link” to Judge Patrick, and instead propagated a known falsehood to place into question all of Judge Patrick’s rulings, ethics, and objectivity as it related to an issue of significant import to various sides of the “cancel culture” movement.

**V. THEORIES OF LIABILITY/CAUSES OF ACTION**

**COUNT I  
FALSE LIGHT  
PLAINTIFF v. THE DAILY BEAST DEFENDANTS**

24. Plaintiff incorporates herein by reference each and every preceding paragraph of this Complaint as if each were set forth fully herein.

25. Defendants Bradley and The Daily Beast (Daily Beast defendants) engaged defendant Bradley as an agent (actual, ostensible, or otherwise), servant, and/or employee, and published the above-mentioned articles with its statements, innuendos and implications to individuals in Philadelphia County, Pennsylvania, the tristate area, the nation, and the world, who understood the statements, innuendos and implications to place Judge Patrick in a false light with the general public.

26. The Daily Beast defendants' 9 October 2021 article used the knowingly false Q'Anon "link" smear to punish a female, conservative, African-American jurist who had the audacity to find against the Philadelphia Mayor's incorrect actions regarding the Columbus statue, instead following the law and ordering the removal of the plywood covering of this statue.

27. The aforementioned false light in which Judge Patrick was placed would be highly offensive to a reasonable person.

28. The Daily Beast defendants had knowledge of, or acted in reckless disregard as to, the falsity of the matter they communicated and the false light in which Judge Patrick was placed.

29. The publication has caused Judge Patrick irreparable harm to her reputation and business as well as mental suffering, shame, humiliation, physical and emotional distress.

30. As a direct and proximate cause of the Defendants' malicious, intentional, or reckless conduct as set forth above, Judge Patrick is entitled to such damages that will compensate for her injuries, including punitive damages to punish the Defendants for their conduct, and deter them and others similarly situated from similar acts in the future.

31. Judge Patrick seeks compensatory and punitive damages as a result of The Daily Beast defendants' deliberate, reckless and outrageous conduct set forth above.

**WHEREFORE**, Plaintiff demands judgment against all defendants, jointly, severally and/or individually, in an amount substantially in excess of the jurisdictional limit, compensatory damages, punitive damages, attorneys' fees, costs and interest, together with any further relief which this Court deems just and appropriate under the circumstances.

**NOTICE OF PRESERVATION OF EVIDENCE**

PLAINTIFF HEREBY DEMANDS AND REQUESTS THAT DEFENDANTS TAKE NECESSARY ACTION TO ENSURE THE PRESERVATION OF ALL DOCUMENTS, COMMUNICATIONS, WHETHER ELECTRONIC OR OTHERWISE, ITEMS AND THINGS IN THE POSSESSION OR CONTROL OF ANY PARTY TO THIS ACTION, OR ANY ENTITY OVER WHICH ANY PARTY TO THIS ACTION HAS CONTROL, OR FROM WHOM ANY PARTY TO THIS ACTION HAS ACCESS TO, ANY DOCUMENTS, ITEMS, OR THINGS WHICH MAY IN ANY MANNER BE RELEVANT TO OR RELATE TO THE SUBJECT MATTER OF THE CAUSES OF ACTION AND/OR THE ALLEGATIONS OF THIS COMPLAINT.



**DEMAND FOR JURY TRIAL**

Plaintiff demands a jury trial of six.

**THE BEASLEY FIRM, LLC**

BY: /s/ James E. Beasley Jr.  
JAMES E. BEASLEY, JR.  
DION G. RASSIAS  
THE BEASLEY BUILDING  
1125 Walnut Street  
Philadelphia, PA 19107  
215.592.1000  
215.592.8360 (telefax)  
Attorneys for Plaintiff

Dated: 20 April 2022